

3. Since Akin's 2017 retention, I have served as lead defense counsel for Mr. Schulman in the DOJ Claim.

4. Beginning in May 2017, I began submitting Akin's invoices for costs incurred by Mr. Schulman in the DOJ Claim directly to Mendes & Mount, as the identified claims representative on behalf of Defendants AXIS Surplus Insurance Company and Endurance American Specialty Insurance Company (the "Primary Carriers").

5. From matter inception in 2017 through December 2020, I sought payment on these invoices from the Primary Carriers pursuant to their agreement with Mr. Schulman to cover seventy percent (70%) of Akin's fees and 100 percent (100%) of costs incurred for the DOJ Claim—rates I understand were negotiated as between the Primary Carriers and Mr. Schulman's prior law firm of Shulman, Rogers, Gandal, Pordy & Ecker, P.A.

6. As of yearend 2020, Mr. Schulman incurred, and Akin submitted to the Primary Carriers invoices totaling in excess of \$1,000,000 in fees and expenses incurred for the DOJ Claim. Akin received payment in excess of \$700,000 from the Primary Carriers on such DOJ Claim invoices.

7. However, beginning in December 2020, with payment on prior months' invoices outstanding, the Primary Carriers abruptly stopped responding to my written requests for reimbursement, and altogether stopped making payments to Akin for costs and fees incurred on behalf of Mr. Schulman in connection with the DOJ Claim.

8. The Primary Carriers have not paid any amounts on outstanding 2020 invoices totaling in excess of \$180,000 for costs and fees incurred in connection with the DOJ Claim. These outstanding amounts include fees and costs incurred for work performed prior to the return

of the Indictment against Mr. Schulman. Nor have the Primary Carriers made any payment on any 2021 invoices reflecting fees and costs incurred in the DOJ Claim.

9. As of May 31, 2021, Akin has billed, and Mr. Schulman has incurred in excess of \$2,000,000 in fees and costs respecting defense of Mr. Schulman in connection with the DOJ Claim.

10. Akin has received no payment from the Primary Carriers on costs and fees billed for Mr. Schulman's defense in the DOJ Claim since December 2020.

11. Mr. Schulman's defense is actively ongoing as the DOJ Claim remains pending. Mr. Schulman continues to incur significant fees and costs for my and Akin's representation in the DOJ Claim.

Under penalty of perjury, I declare that the foregoing is true and correct to the best of my knowledge.

Dated: District of Columbia
June 30, 2021

By: Paul W. Butler
Paul W. Butler